

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: February 21, 1995

SUBJECT: Blackwell Forest Preserve Alternatives Array

FROM: Judy Kleiman, RCRA/CERCLA Liaison

TO: Duane Heaton, RPM

EPA Region 5 Records Ctr.



248021

The Alternative Array for the Blackwell Forest Preserve in DuPage County, Illinois has been reviewed by RCRA for ARARs. Municipal and light industrial wastes were disposed of at this site. No RCRA waste is known to have been disposed of here and none of the samples of groundwater, soil, or sediments were characteristic by the TCLP. However, the leachate exceeded the TCLP limit for trichloroethylene. RCRA ARARs will be applicable for the management and treatment of the leachate, but residuals generated by treatment of the leachate are not likely to be characteristic, as explained below. Other components of remedial action will not generate hazardous waste and will not trigger RCRA ARARs.

There are no RCRA ARARs no action.

There are no RCRA ARARs for passive landfill gas venting and monitoring.

Thermal destruction of the landfill gas will not trigger RCRA ARARs since the landfill gas is not characteristic and is not known to contain any listed RCRA waste.

Since the leachate is characteristic for TCE, any tanks used for the on site storage and treatment of the leachate must meet the substantive requirements of RCRA, but residual sludge produced by treatment of the leachate is not likely to be characteristic. Sludge produced by chemical precipitation will contain metals, but the organic constituents of concern will not be precipitated. (If the TC metals are constituents of concern, the sludge could be characteristic for metals.)

Residuals from biological treatment of the leachate are not likely to be characteristic.

A RCRA cap is not an ARAR, since no RCRA waste is known to have been disposed of here.

If you have any questions on this matter, please contact me at 6-1482

cc: Karl Bremer

## APPENDIX A

### APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS a/

#### 1. Office of Solid Waste

- Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6901) b/
  - a. 40 CFR Part 264, applicable for permitted facilities c/, and 40 CFR Part 265, for interim status facilities.
    - Groundwater Protection (40 CFR 264.90-264.101)
    - Groundwater Monitoring, Subpart F (40 CFR 264.98-264.100) d/
    - Closure and Post-Closure (40 CFR 264.110-264.120, 265.110-265.120)
    - Containers (40 CFR 264.170-264.178, 265.190-265.177)
    - Tanks (40 CFR 264.190-264.200, 265.190-265.199)
    - Surface Impoundments (40 CFR 264.220-264.249, 265.220-265.230)
    - Waste Piles (40 CFR 264.250-264.269, 265.250-265.258)
    - Land Treatment (40 CFR 264.270-264.299, 265.270-265.282)
    - Incinerators (40 CFR 264.340-264.999, 265.340-265.369)
    - Land Disposal Restrictions (40 CFR 268.1-268.50)
  - b. 40 CFR Part 280, Underground Storage Tank Regulations
  - c. Statutory requirements, including:
    - Liquids in Landfills (RCRA §3004(c))
    - Minimum Technology Requirements (RCRA §3004(o), 3005(j))
    - Dust Suppression (RCRA §3004(e))
    - Hazardous Waste Used as Fuel (RCRA §3004(q))
  - d. Open Dump Criteria - pursuant to RCRA Subtitle D: criteria for classification of solid waste disposal facilities (40 CFR Part 257). Note: For nonhazardous wastes.

#### 2. Office of Water

- The Safe Drinking Water Act (42 U.S.C. 300(f))
  - a. Maximum Contaminant Levels (chemicals, turbidity, and microbiological contamination) (for drinking water or human consumption) (40 CFR 141.11-141.16).
  - b. Maximum Contaminant Level Goals (40 CFR 141.50-141.51, 50 FR 46936).

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#### 4. Other Federal Requirements (Cont.)

- Farmland Protection Policy Act, 7 U.S.C. 4201. (Generally, 7 CFR Part 658).
- Rivers and Harbors Act (33 U.S.C. 403).

#### 5. State Requirements

- Title 35: Env. Prot. Act Subtitle B:
  - a. Air Pollution Chapter T: Subchapter C:
    - 35 IAC 212.121-125,
    - 35 IAC 212.421
  - b. Air Pollution Subchapter A:
    - 35 IAC 201.151
  - c. Air Pollution Subparagraph A: Permits
    - 35 IAC 201.141-144,
    - 35 IAC 201.146-147,
    - 35 IAC 201.149,
    - 35 IAC 201.12-165,
    - 35 IAC 201.207-210,
    - 35 IAC 201.261-265,
    - 35 IAC 201.282-283,
    - 35 IAC 201.301-302
  - d. Air Pollution Subchapter C, Emissions Stds. and Limitations for Stationary Sources
    - 35 IAC 212.110,
    - 35 IAC 212.181-185
    - 35 IAC 212.302,
    - 35 IAC 212.304-310,
    - 35 IAC 212.312-315,
    - 35 IAC 212.321-323,
    - 35 IAC 212.361,
    - 35 IAC 212.381,
    - 35 IAC 212.422,
    - 35 IAC 212.441,
    - 35 IAC 212.455-457,
    - 35 IAC 212.461-463,
    - 35 IAC 212.681,
    - 35 IAC 215.101-102,

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- Title 35: Env. Prot. Subtitle C: (Cont.)
  - a. Water Pollution Subpart B: General Use Water Quality Standards (Cont.)
    - 35 IAC 304.301,
    - 35 IAC 306.201,
    - 35 IAC 306.302-306,
    - 35 IAC 306.401-406,
    - 35 IAC 309.201-282
  - b. Water Pollution Subpart C: Public and Food Processing Water Supply Standards
    - 35 IAC 302.304
    - 35 IAC 304.102-106,
    - 35 IAC 304.141,
    - 35 IAC 305.102-103,
    - 35 IAC 305.306,
    - 35 IAC 305.102,
    - 35 IAC 307.101-105
- Title 35: Env. Prot. Subtitle F:
  - Public Water Supplies Subpart B:
    - Chemical and Physical Quality 35 IAC 604.202
    - Public Water Supplies 35 IAC 604.203-204, 605.103
- Title 35 Env. Prot. Act Subtitle G:
  - a. Waste Disposal C:
    - 35 IAC 700.101-504,
    - 35 IAC 702.101-187,
    - 35 IAC 703.101-246,
    - 35 IAC 704.101-203,
    - 35 IAC 705.121-212,
    - 35 IAC 720.101-122,
    - 35 IAC 721.101-133,
    - 35 IAC 722.110-131,
    - 35 IAC 724.101-451,
    - 35 IAC 725.101-530,
    - 35 IAC 726.120-180,
    - 35 IAC 730.101-152 Dept. of Mines and Minerals Rule IIA,
    - 35 IAC 809.101-802,
    - 35 IAC 811

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APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS a/OTHER FEDERAL AND STATE CRITERIA, ADVISORIES, AND GUIDANCE TO BE CONSIDERED a/1. Federal Criteria, Advisories, and Procedures

- Health Effects Assessments (HEAs) and Proposed HEAs, ("Health Effects Assessment for (Specific Chemicals)," ECAO, USEPA, 1985).
- Reference Doses (RfDs), ("Verified Reference Doses of USEPA," ECAO-CIN 475, January 1986). See also Drinking Water Equivalent Levels (DWELs), a set of medium-specific drinking water levels derived from RfDs. (See USEPA Health Advisories, Office of Drinking Water, March 31, 1987).
- Carcinogen Potency Factors (CPFs) (e.g., Q1 Stars, Carcinogen Assessment Group [CAG] Values), (Table 11, "Health Assessment Document for Tetrachloroethylene (Perchloroethylene)," USEPA, OHEA/6008 82/005F, July 1985).
- Waste load allocation procedures, EPA Office of Water (40 CFR Part 125, 130).
- Federal Sole Source Aquifer requirements (see 52 FR 6873, March 5, 1987).
- Public health criteria on which the decision to list pollutants as hazardous under Section 112 of the Clean Air Act was based.
- Guidelines for Groundwater Classification under the EPA Groundwater Protection Strategy.
- Advisories issued by PWS and NWPS under the Fish and Wildlife Coordination Act.
- OSHA health and safety standards that may be used to protect public health (non-workplace).
- Health Advisories, EPA Office of Water.
- EPA Water Quality Advisories, EPA Office of Water, Criteria and Standards Division.

2. USEPA RCRA Guidance Documents

- Interim Final Alternate Concentration Limit Guidance Part 1: ACL Policy and Information Requirements (July, 1987)
  - a. EPA's RCRA Design Guidelines
  - b. Permitting Guidance Manuals
  - c. Technical Resource Documents (TRDs)
  - d. Test Methods for Evaluating Solid Waste

3. USEPA Office of Water Guidance Documents

- a. Pretreatment Guidance Documents
- b. Water Quality Guidance Documents
- c. NPDES Guidance Documents
- d. Groundwater/UIC Guidance Documents
- e. Groundwater Protection Strategy (August 1984).
- f. Clean Water Act Guidance Documents